

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

TRI-CITIES HOLDINGS LLC, JANE DOE)
NOS. 1-2, AND JOHN DOE NOS. 1-6,)
Plaintiffs,) Civil Action No. 3:12-cv-00669
v.) Judge Haynes
TENNESSEE HEALTH SERVICES AND)
DEVELOPMENT AGENCY; CITY OF)
JOHNSON CITY, TENNESSEE; JOHNSON)
CITY BOARD OF COMMISSIONERS; AND)
JOHNSON CITY BOARD OF ZONING)
APPEALS,)
Defendants.)

**TENNESSEE HEALTH SERVICES AND DEVELOPMENT AGENCY'S
MOTION FOR AN EXTENSION OF TIME TO ANSWER OR OTHERWISE
RESPOND TO COMPLAINT**

The state defendant, Tennessee Health Services and Development Agency (“HSDA”), hereby respectfully requests that the Court grant it an additional twenty-one (21) days from August 5, 2013, the date its answer or response is presently due, to answer or otherwise respond to the Complaint. In support of this motion, the HSDA notes that this is its first request for an extension of time to answer, that the Complaint is more than 70 pages in length, that the HSDA requires additional time in which to investigate and respond to the Complaint, and that the Court has granted the other defendants in the lawsuit the additional twenty-one days in which to respond that is being requested by the HSDA herein (Doc. 25).

WHEREFORE, the HSDA respectfully requests that the Court grant it a 21-day extension

of time in which to answer or respond to the Complaint; *i.e.*, up through and including August 26, 2013.

Respectfully submitted,

ROBERT E. COOPER, JR.
Attorney General and Reporter

s/Sue A. Sheldon
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served on the following counsel of record through the Electronic Filing System on this 31st day of July, 2013:

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